

The Honorable Marc Barreca  
Chapter 7  
Hearing Date: December 13, 2018  
Hearing Time: 9:30 AM  
Hearing Location: US Courthouse /Seattle, WA

UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

IN RE:	Case No.: 12-11284-MLB
DEMETRIUS BERTRAND DICKERSON SR,	Chapter: 7
Debtor.	DEBTOR'S WITNESS AND EXHIBIT LIST

The Chapter 7 Debtor, Demetrius Bertrand Dickerson, (“Debtor”) hereby submits its non-expert witnesses and exhibit list pursuant the Court’s Notice of Evidentiary Hearing and Order Setting Deadlines, Dkt. No. 61.

## I. Non-Expert Witnesses

1. Jason Woehler (In House Counsel for Merchants Credit)  
c/o Marc Rosenberg  
180 One Convention Place  
701 Pike Street  
Seattle, WA 98101  
(206) 624-7990  
[mr@leesmart.com](mailto:mr@leesmart.com)

**DEBTOR'S WITNESS AND EXHIBIT LIST - 1**

**HENRY & DEGRAAFF, P.S.**  
150 NICKERSON ST. STE 311  
SEATTLE, WASHINGTON 98109  
telephone (206) 330-0595  
fax (206) 400-7609

- 1           2. Merchants Credit Corporation's Rule 30(b)(6) Witness  
 2           c/o Marc Rosenberg  
 3           180 One Convention Place  
 4           701 Pike Street  
 5           Seattle, WA 98101  
 6           (206) 624-7990  
 7           [mr@leesmart.com](mailto:mr@leesmart.com)
- 8           3. Alex Sandoval (Compliance Officer for Merchants Credit)  
 9           c/o Marc Rosenberg  
 10          180 One Convention Place  
 11          701 Pike Street  
 12          Seattle, WA 98101  
 13          (206) 624-7990  
 14          [mr@leesmart.com](mailto:mr@leesmart.com)
- 15          4. Carol Taylor (Operations Manager for Merchants Credit)  
 16          c/o Marc Rosenberg  
 17          180 One Convention Place  
 18          701 Pike Street  
 19          Seattle, WA 98101  
 20          (206) 624-7990  
 21          [mr@leesmart.com](mailto:mr@leesmart.com)
- 22          5. Debtors may also call rebuttal witnesses that do not have to identified at this time.

16          II. **EXHIBIT LIST**

Number	Exhibit	Date
D1	Merchants Credit Collection Notes	N/A
D2	Copy of the Dickerson's King County Marriage Record	7/2/2007
D3	Summons and Complaint, Merchants Credit Corporation v. Shirley Dickerson AKA Bowen, King County District Court, Case No. 93-17172 (certified copy)	11/6/2009
D4	Motion, Affidavit and Order for Default Judgment, Merchants Credit Corporation v. Shirley Dickerson AKA Bowen, King County District Court, Case No. 93-17172 (certified copy)	1/7/2010
D5	Writ of Garnishment of Continuing Lien on Earnings, Merchants Credit Corporation v. Shirley Dickerson AKA Bowen, King County District Court, Case No. 93-17172 (certified copy)	2/26/2010
D6	First Answer to Writ of Garnishment for Continuing Lien on Earnings, Merchants Credit Corporation v. Shirley Dickerson AKA Bowen, King County District Court, Case No. 93-17172 (certified copy)	3/22/2010

1	D7	Second Answer to Writ of Garnishment for Continuing Lien on Earnings, Merchants Credit Corporation v. Shirley Dickerson AKA Bowen, King County District Court, Case No. 93-17172 (certified copy)	6/14/2010
2	D8	Judgment and Order to Pay, Merchants Credit Corporation v. Shirley Dickerson AKA Bowen, King County District Court, Case No. 93-17172 (certified copy)	7/2/2010
3	D9	Writ of Garnishment for Continuing Lien on Earnings, Merchants Credit Corporation v. Shirley Dickerson AKA Bowen, King County District Court, Case No. 93-17172 (certified copy)	8/27/2010
4	D10	Second Answer to Writ of Garnishment for Continuing Lien on Earnings, Merchants Credit Corporation v. Shirley Dickerson AKA Bowen, King County District Court, Case No. 93-17172 (certified copy)	11/17/2010
5	D11	Judgment and Order to Pay, Merchants Credit Corporation v. Shirley Dickerson AKA Bowen, King County District Court, Case No. 93-17172 (certified copy)	12/13/2010
6	D12	First Answer to Writ of Garnishment for Continuing Lien on Earnings, Merchants Credit Corporation v. Shirley Dickerson AKA Bowen, King County District Court, Case No. 93-17172 (certified copy)	2/22/2011
7	D13	Second Answer to Writ of Garnishment for Continuing Lien on Earnings, Merchants Credit Corporation v. Shirley Dickerson AKA Bowen, King County District Court, Case No. 93-17172 (certified copy)	5/06/2011
8	D14	Writ of Garnishment for Continuing Lien on Earnings, Merchants Credit Corporation v. Shirley Dickerson AKA Bowen, King County District Court, Case No. 93-17172 (certified copy)	7/06/2011
9	D15	First Answer to Writ of Garnishment for Continuing Lien on Earnings, Merchants Credit Corporation v. Shirley Dickerson AKA Bowen, King County District Court, Case No. 93-17172 (certified copy)	7/29/2011
10	D16	Release of Writ of Garnishment, Merchants Credit Corporation v. Shirley Dickerson AKA Bowen, King County District Court, Case No. 93-17172 (certified copy)	8/5/2011
11	D17	Writ of Garnishment for Continuing Lien on Earnings, Merchants Credit Corporation v. Shirley Dickerson AKA Bowen, King County District Court, Case No. 93-17172 (certified copy)	1/26/2012
12	D18	First Answer to Writ of Garnishment for Continuing Lien on Earnings, Merchants Credit Corporation v. Shirley Dickerson AKA Bowen, King County District Court, Case No. 93-17172 (certified copy)	2/8/2012
13	D19	Release of Writ of Garnishment, Merchants Credit Corporation v. Shirley Dickerson AKA Bowen, King County District Court, Case No. 93-17172 (certified copy)	3/8/2012

DEBTOR'S WITNESS AND EXHIBIT LIST - 3

**HENRY & DEGRAAFF, P.S.**  
 150 NICKERSON ST. STE 311  
 SEATTLE, WASHINGTON 98109  
 telephone (206) 330-0595  
 fax (206) 400-7609

1	D20	King County District Court Notice of Pending Dismissal for Inactivity, Merchants Credit Corporation v. Shirley Dickerson AKA Bowen, King County District Court, Case No. 93-17172 (certified copy)	10/01/2015
2	D21	Application for Writ of Garnishment, Merchants Credit Corporation v. Shirley Dickerson AKA Bowen, King County District Court, Case No. 93-17172 (certified copy)	4/18/2018
3	D22	First Answer to Writ of Garnishment for Continuing Lien on Earnings, Merchants Credit Corporation v. Shirley Dickerson AKA Bowen, King County District Court, Case No. 93-17172 (certified copy)	5/11/2018
4	D23	First Answer to Writ of Garnishment for Continuing Lien on Earnings, Merchants Credit Corporation v. Shirley Dickerson AKA Bowen, King County District Court, Case No. 93-17172 (certified copy)	5/16/2018
5	D24	Second Answer to Writ of Garnishment for Continuing Lien on Earnings, Merchants Credit Corporation v. Shirley Dickerson AKA Bowen, King County District Court, Case No. 93-17172 (certified copy)	6/29/2018
6	D25	Merchants Credits' Application for Judgment on Answer and Order to Pay, Merchants Credit Corporation v. Shirley Dickerson AKA Bowen, King County District Court, Case No. 93-17172 (certified copy)	8/9/2018
7	D26	Merchants Credits' Certification of Garnishment Costs, Merchants Credit Corporation v. Shirley Dickerson AKA Bowen, King County District Court, Case No. 93-17172 (certified copy)	8/9/2018
8	D27	Merchants Credit's Declaration of Service of Writ of Garnishment by Certified Mail, Merchants Credit Corporation v. Shirley Dickerson AKA Bowen, King County District Court, Case No. 93-17172 (certified copy)	8/9/2018
9	D28	Merchants Credit's Judgment and Order to Pay (signed order), Merchants Credit Corporation v. Shirley Dickerson AKA Bowen, King County District Court, Case No. 93-17172 (certified copy)	8/9/2018
10	D29	Merchants Credit Military Status Declaration, Merchants Credit Corporation v. Shirley Dickerson AKA Bowen, King County District Court, Case No. 93-17172 (certified copy)	8/9/2018
11	D30	Merchants Credit's Release of Writ of Garnishment, Merchants Credit Corporation v. Shirley Dickerson AKA Bowen, King County District Court, Case No. 93-17172 (certified copy)	9/21/2018
12	D31	King County District Court Docket regarding Merchants Credit Corporation v. Shirley Dickerson AKA Bowen, King County District Court, Case No. 93-17172	12/7/2018
13	D32	Transcript of Recorded Call between Shirley Dickerson and Merchants Credit (0199 20180430)	4/30/2018
14	D33	Transcript of Recorded Call between Shirley Dickerson and Merchants Credit (0799 20180503)	5/3/2018

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**HENRY & DEGRAAFF, P.S.**  
 150 NICKERSON ST. STE 311  
 SEATTLE, WASHINGTON 98109  
 telephone (206) 330-0595  
 fax (206) 400-7609

1	D34	Transcript of Recorded Call between Shirley Dickerson and Merchants Credit (1099_20180510)	5/10/2018
2	D35	Transcript of Recorded Call between Shirley Dickerson and Merchants Credit (0599_20180501_170722_001411_i_2067241586_4256432613_0)	5/1/2018
3	D36	Transcript of Recorded Call between Shirley Dickerson and Merchants Credit (0999_20180508_154947_001327_i_2067241586_4256432613_1)	5/1/2018
4	D37	Transcript of Recorded Call between Shirley Dickerson and Merchants Credit (1599_20180518_134809_001414_i_2067241586_4256432613_0)	5/18/2018
5	D38	Transcript of Recorded Call between Shirley Dickerson and Merchants Credit (1199_20180514_171013_000655_i_2067241586_4256432613_0)	5/14/2018
6	D39	Transcript of Recorded Call between Shirley Dickerson and Merchants Credit (0699_20180502_082136_000547_i_2067241586_4256432613_0)	5/2/2018
7	D40	Transcript of Recorded Call between Shirley Dickerson and Merchants Credit (1299_20180515_170753_000549_i_2067241586_4256432613_0)	5/15/2018
8	D41	Transcript of Recorded Call between Shirley Dickerson and Merchants Credit (0499_20180501_153101_000059_i_2067241586_4256432613_140)	5/1/2018
9	D42	Transcript of Recorded Call between Shirley Dickerson and Merchants Credit (1399_20180516_090025_000228_i_2067241586_4256432613_0)	5/16/2018
10	D43	Transcript of Recorded Call between Shirley Dickerson and Merchants Credit (1499_20180516_154713_001249_i_2067241586_4256432613_0)	5/16/2018
11	D44	Transcript of Recorded Call between Shirley Dickerson and Merchants Credit (1699_20180521_080003_000351_i_2067241586_4256432613_0)	5/21/2018
12	D45	Chapter 7 Bankruptcy Petition for Demetrius Bertrand Dickerson, Case No. 12-11284-MLB, Dkt No. 1	2/12/2012
13	D46	Chapter 7 Bankruptcy 341 Meeting of Creditor Notice (with BNC mailing) for Demetrius Bertrand Dickerson, Case No. 12-11284-MLB, Dkt No. 9	
14	D47	Chapter 7 Bankruptcy Discharge of Demetrius Bertrand Dickerson (with BNC mailing), Case No. 12-11284-MLB, Dkt No. 13	6/14/2012
15	D48	Motion for Sanctions for Violation of the Discharge Injunction, Case No. 12-11284-MLB, Dkt No. 24	7/25/2018

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150 NICKERSON ST. STE 311  
SEATTLE, WASHINGTON 98109  
telephone (206) 330-0595  
fax (206) 400-7609

1	D49	Email to Jason Woehler re Subpoena re Motion for Discharge Violation with Subpoena with Exhibit A attached	7/30/218
2	D50	Email to Jason Woehler re Subpoena re Motion for Discharge Violation with Letter attached	8/1/2018
3	D51	Email correspondence with Jason Woehler re Deposition date	8/1/2018
4	D52	Email to Jason Woehler rerevised Subpoena re Motion for Discharge Violation with Subpoena with Exhibit A and Exhibit B attached	8/2/2018
5	D53	Fax Sent to Merchants Credit Corporation, Letter from Andrew Gebelt re Discharge dated 8/1/2012	4/3/2018
6	D54	Merchants Credit Collection Notes	N/A
7	D55	Fax from Shirley Dickerson to David Fagan at Merchants Credit Corporation	5/14/2018
8	D56	Letter from Christina L Henry to David Quigley at Merchants Credit Re Discharge Violation	6/8/2018
9	D57	Merchants Credits' Policies and Procedures regarding Garnishment and Bankruptcy	N/A
10	D58	Pacer Search	N/A
11	D59	Internal Merchants Credit Email from Cassandra Downs to Jason Woheler	5/3/2018
12	D60	Copy of Jason Woehler's Outlook Calendar for June 2018 through August 2018.	6/4/2018 to 8/31/2018
13	D61	Internal Merchants Credit Email from Danielle Arrasmith to Jason Woheler	7/26/2018
14	D62	Internal Merchants Email correspondence between Danielle Arrasmith and Jason Woehler	7/26/2018
15	D63	Internal Merchants Email correspondence between Jason Woehler and James Dickmeyer	8/3/2018
16	D64	Internal Merchants Email correspondence between Jason Woehler and James Dickmeyer	8/21/2018
17	D65	Internal Merchants Email correspondence between Jason Woehler and James Dickmeyer	8/21/2018
18	D66	Internal Merchants Email correspondence regarding release of garnishment	8/29/2018
19	D67	Internal Merchants Email correspondence between Danielle Arrasmith and Jason Woehler	5/1/2018
20	D68	Invoice from Jim Dickmeyer to Merchants for services rendered	9/1/2018

Respectfully submitted this 7<sup>th</sup> day of December 2018.

*/s/ Christina L. Henry*

Christina L. Henry, WSBA # 31273  
 Henry & DeGraaff, PS  
 150 Nickerson St., Ste. 311  
 Seattle, WA 98109  
 Tel# 206-330-0595 / Fax# 206-400-7609  
[chenny@hdm-legal.com](mailto:chenny@hdm-legal.com)

DEBTOR'S WITNESS AND EXHIBIT LIST - 6

**HENRY & DEGRAAFF, P.S.**  
 150 NICKERSON ST. STE 311  
 SEATTLE, WASHINGTON 98109  
 telephone (206) 330-0595  
 fax (206) 400-7609

1  
2                   **CERTIFICATE OF SERVICE**  
3  
4

5                   I, Christina L Henry, declare under penalty of perjury as follows:  
6  
7

- 8                   1. I am over the age of eighteen years, a citizen of the United States, not a party herein, and am  
9 competent to testify to the facts set forth in this Declaration.  
10  
11                 2. That on December 7, 2018, I caused the foregoing document attached to this Certificate of  
12 Service along with attached exhibits upon the following individuals via CM/ECF:  
13

14                   James E. Dickmeyer on behalf of Creditor Merchants Credit Corporation [jim@jdlaw.net](mailto:jim@jdlaw.net),  
15                   [jim.dickmeyer@gmail.com](mailto:jim.dickmeyer@gmail.com)

16                   Marc Rosenberg on behalf of Creditor Merchants Credit Corporation [mr@leesmart.com](mailto:mr@leesmart.com)

17                   Christina L Henry on behalf of Debtor Demetrius Bertrand Dickerson, Sr [mainline@hdm-](mailto:mainline@hdm-legal.com)  
18                   [HenryDeGraaffPS@jubileebk.net](mailto:HenryDeGraaffPS@jubileebk.net)

19                   James Rigby [rigbylaw@aol.com](mailto:rigbylaw@aol.com), [jr@trustesolutions.com](mailto:jr@trustesolutions.com); [jr@trustesolutions.net](mailto:jr@trustesolutions.net);  
20                   [patti@liveslaw.com](mailto:patti@liveslaw.com)

21                   United States Trustee [USTPRegion18.SE.EDF@usdoj.gov](mailto:USTPRegion18.SE.EDF@usdoj.gov)

22                   I CERTIFY UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE STATE OF  
23 WASHINGTON THAT THE FOREGOING STATEMENT IS BOTH TRUE AND CORRECT.

24                   Dated this December 7, 2018, at Seattle, Washington.

25                   \_\_\_\_\_  
26                   /s/ Christina L Henry  
27                   Christina L Henry

28 DEBTOR'S WITNESS AND EXHIBIT LIST - 7

29                   **HENRY & DEGRAAFF, P.S.**  
30                   150 NICKERSON ST. STE 311  
31                   SEATTLE, WASHINGTON 98109  
32                   telephone (206) 330-0595  
33                   fax (206) 400-7609